

ORIGINAL

(4)
8-9-01
SC

MCC:MCF:pak

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

GLADWIN WILSON) Civil No. 1:CV-01-1226
Petitioner,)
) (Judge Caldwell)
v.)
)
IMMIGRATION AND NATURALIZATION)
SERVICE,)
Respondent.)

MOTION FOR ENLARGEMENT OF TIME

FILED
HARRISBURG
AUG 8 2001
MARY E. D'ANDREA
DEPUTY CLERK

COMES NOW, the United States of America, by its attorneys, Martin C. Carlson, United States Attorney for the Middle District of Pennsylvania and Mary Catherine Frye, Assistant United States Attorney, who files this Motion for Enlargement of Time and, in support thereof, respectfully represents to the Court the following facts:

1. On July 2, 2001, the Petitioner filed a Petition for Writ of Habeas Corpus.
2. On July 19, 2001, the Court issued an Order to Show Cause directing the respondents to file a response by August 8, 2001.
3. The petition is being handled on a shared basis with assistance of legal counsel from the Department of Justice Office of Immigration Litigation (OIL).

4. OIL legal counsel has informed the undersigned that the Response is being Federal Expressed to the Court today.


5. The undersigned did not seek petitioner's concurrence because Gladwin Wilson currently is incarcerated and is proceeding pro se.

6. The petitioner's claim will not be prejudiced by this short continuance.

WHEREFORE, it is respectfully requested that this Honorable Court grant a one day extension of time to respond to this petition no later than August 9, 2001.

Respectfully submitted,

MARTIN C. CARLSON
United States Attorney


MARY CATHERINE FRYE
Assistant United States Attorney
P.O. Box 11754
Harrisburg, PA 17108-1754
(717) 221-4482

Date: 8-8-01

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CERTIFICATE OF SERVICE

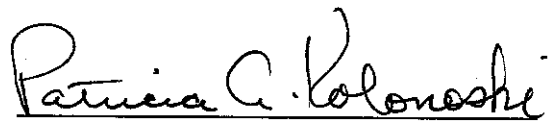
The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion to be competent to serve papers.

That this 8th day of August, 2001 she served a copy of the attached

MOTION FOR ENLARGEMENT OF TIME

by placing said copy in a postpaid envelope addressed to the person(s) hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania.

ADDRESSEE(S):
Gladwin Wilson, Reg. No. 9900345
Snyder County Jail
600 Old Colony Road
Selinsgrove, PA 17870-8610


PATRICIA A. KOLONOSKI
Legal Secretary